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HIPAA
National Provider Identifier

Dual Use of NPI & Legacy Identifiers

Voluntary Strategy for Transitional, Dual Use of NPI and Legacy Identifiers on X12 Transactions

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Dual Use of NPI & Legacy Identifiers

Voluntary Strategy for Transitional, Dual Use of NPI and Legacy Identifiers on X12 Transactions

1.0 Purpose of This Paper

This paper specifies transitional use of both National Provider Identifier (NPI) and Legacy identifiers in HIPAA X12 standard transactions, and it explains the importance of the ***Schedule Independence*** strategy.

2.0 Value

The objective of these specifications is to enable each organization largely to schedule its own system changes for claims, remittance advices, and other transactions independently of its trading partners. With widespread adoption, these specifications have the potential significantly to reduce an entity's dependence on the schedules of its trading partners. It offers the potential to make the NPI transition much easier throughout the health care industry and to enable implementation without phase delays and extended bilateral testing and conversion.

3.0 Scope

This version of the paper specifies dual, transitional use of NPI and Legacy identifiers on:

- 837 Institutional Claim
- 837 Professional Claim
- 837 Dental Claim
- 835 Remittance Advice
- 270/271 Eligibility Benefit Inquiry & Response
- 278 Health Care Services Review & Response

These standard transactions represent by far the largest part of the NPI implementation concern. The standards for these transaction types permit the dual identifier specifications described in this paper. The standards version currently adopted is 4010A1, and it is not expected to be changed during the useful life of this paper.

Other transactions. The paper does not address other standard X12 or NCPDP transactions, although it may address other transactions in a later version. Some transactions are not readily compatible with the dual use strategy

Paper claim forms and their instructions are currently being modified to accommodate and encourage use of NPI. We anticipate that this paper will be updated to include paper claims.

Internal systems not addressed. The paper deals only with transactions between entities. It does not specify changes to internal systems or directories. These are for other papers.

4.0 Definition of 'Legacy Identifier'

For purposes of this paper only, a "Legacy Identifier" is any provider identifier besides NPI. So for purposes of this paper, Federal Tax ID is included in the "Legacy Identifier", as well as are UPIN, a Blue Cross provider identifier, medical license number, and so forth.

5.0 Duration of Dual Transitional Use of NPI and Legacy Identifiers

The Dual Use strategy is transitional. It is only permitted between now and the NPI compliance date of May 23, 2007 (2008 for small plans). It is not permitted after the compliance date. After the compliance date, where NPI is required, only NPI may be used to identify a provider, and legacy identifiers other than required Federal Tax IDs must be discontinued.

6.0 Description of Dual NPI-Legacy Identification

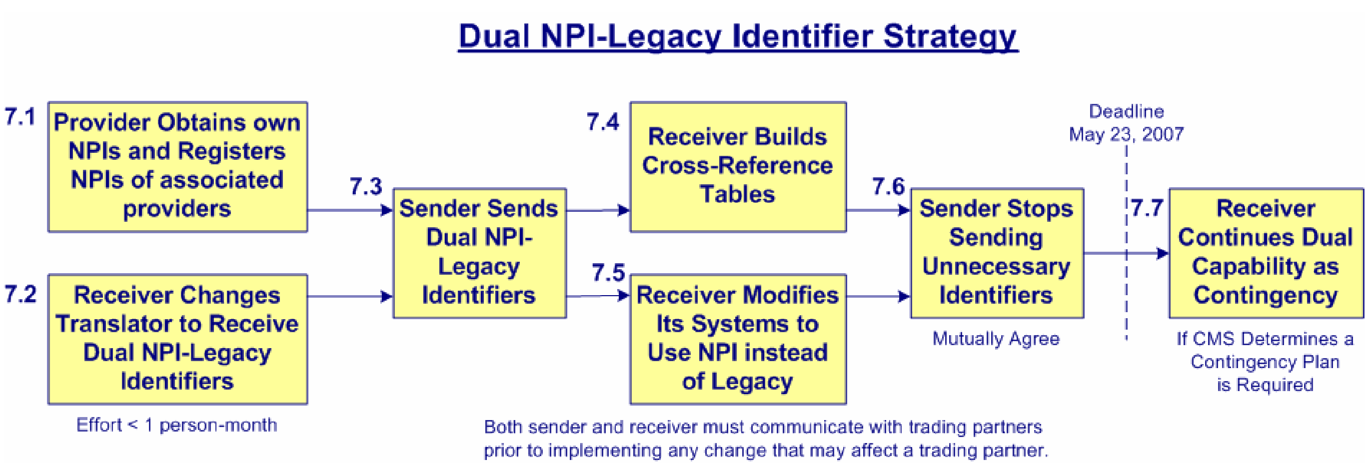
Primary and Secondary Identifiers. On the transactions covered in this paper, providers are generally identified with a primary identifier and multiple secondary identifiers. In the 837 claim, and in some of the 835 provider fields, the current primary identifier is always a Federal Tax ID. NPI will become the primary identifier so that the Federal Tax ID may be moved to one of the secondary identifiers. In some instances, such as Billing Provider, the Federal Tax ID is mandatory and must continue to be supplied as a secondary identifier after the NPI compliance date. Some NPI data elements are situational, including whether the sender knows the NPI.

How it works. With Dual NPI-Legacy, the sender puts NPI in the Primary Identifier field, and it puts all Legacy Identifiers in one of the Secondary Identifier fields. Initially, the receiver's logic ignores the NPI, finds the Legacy Identifier that it needs, and uses that Legacy Identifier as though it had come in as Primary. Later, the receiver changes its internal systems to use NPI as primary and ignores unnecessary legacy identifiers.

Assumption. This strategy assumes that the provider has the legacy and NPI data for both itself and the other providers on its transactions. For the individual provider this may be a straightforward task, but for a hospital or large organizational provider there may be considerable preparatory work. It assumes:

1. That the organizational provider has determined its NPI "sub-part[1] breakdowns", obtained the NPIs, and mapped their legacy identifiers to the NPIs; and
2. That the organizational provider has captured, verified, and mapped the NPI's for attending, rendering, and referring individual providers to their legacy identifiers[2].

7.0 Description of the Dual NPI-Legacy Identifier Strategy



[1] The SNIP NPI Sub-Workgroup is developing a paper to assist an organizational provider determine its subpart NPIs.
[2] The SNIP NPI Sub-Workgroup paper, *"Impact on Providers"*, discusses detailed strategies for the requisite capture, verification, and mapping of NPI to legacy IDs, as well as additional benefits from this process to provider organizations.

7.1 *Provider obtains own NPIs and registers NPIs of associated providers*

Each provider obtains an NPI for itself, and its subparts if applicable, and it communicates its NPIs to trading partners. Hospitals and large organizational providers must also register in their records the NPIs of many other providers, such as attending, rendering, and referring physicians, laboratories, and others, and they must verify and map these NPIs to the legacy identifiers. This step may proceed before, during, or after the next step. It is especially important that a provider use its correct subpart NPI.

7.2 *Receiver able to receive Dual NPI-Legacy Identifiers*

Receivers make a small systems change immediately. The receiver of a transaction modifies its EDI translation process to be able to receive Dual NPI-Legacy Identifiers so that it can receive and process both transactions that have only Legacy Identifiers and transactions that have Dual NPI-Legacy Identifiers. Receivers should implement this step immediately[3].

Who are receivers? Receivers of the 837, 270, and 278 transactions include clearinghouses and health plans. Receivers of the 835, 271, and 278 responses include clearinghouses, provider systems such as practice management and billing systems. Some financial institutions also receive 835 transactions.

What the small change does. All that the software change does when it receives Dual NPI-Legacy identification is find the legacy identifier that it needs in the incoming transaction and use it instead of the new NPI when it forwards the transaction to internal systems. It permits the sender to send the NPI as the primary identifier, but by also sending legacy identifiers, it permits the receiver to process the transaction just as it did before. At this stage, the NPI can be sent in its correct, permanent position in the transaction, but all business would still be conducted with the legacy identifier.

NPI ignored. At this stage, business is conducted with legacy identifiers, and plans would generally not return NPI in claim acknowledgements or other transactions.

Change less than one person-month. The systems development effort for a receiver to make this simple translation change should be very low relative to the overall work required to implement NPI throughout its systems. In many cases, it is only a translator coding problem, and it may require a single person-month or much less. Each receiver should make this change immediately and notify its trading partners.

Maybe no change at all. At present, the primary identifier is a Federal Tax Identifier, and in many cases the legacy identifier that the receiver uses to identify the provider is a secondary identifier in a REF segment. For example, this is the case for Medicare and most Blue Cross plans. For these plans under the dual use strategy, the legacy identifier would continue to be unchanged in a REF segment; so the change might only be to <u>not</u> reject a claim that also has and NPI on it.

[3] The SNIP NPI Sub-Workgroup is also developing a detailed paper on Planning, Sequencing, and Testing NPI.

7.3 Sender sends Dual NPI-Legacy Identifiers

The sender changes its systems, advises its trading partners, and starts sending the NPI as primary provider identifier and Legacy as secondary identifiers. Both the sender and receiver at this stage are still relying on a Legacy Identifier to identify the provider.

It is unreasonable to assume all receivers will implement the Dual Use of NPI-Legacy Identifier strategy; so a sender will need receiver-specific logic, or clearinghouse support, in order to send dual identifiers to some and not to others.

7.4 Receiver may build Legacy-to-NPI cross-reference tables

The Dual NPI-Legacy Identifier strategy can assist a receiver to augment building a cross-reference index between legacy and NPI. Several notes:

- **This paper is not designing systems**. Health care entities will need some means to link providers identified by NPI to records identified by other identifiers. For some entities the need is permanent and for some only transitional. It is not the purpose of this paper to nominate any preferred means to accomplish the requirement, nor even to describe the requirement at length. Rather, this description of cross-reference is only briefly to identify a possible opportunity and its limitations.

- **The challenge of mapping legacy and NPI identifiers**. A cross-reference index cannot be one-for-one because in some cases one legacy identifier will be represented by more than one NPI, and in other cases one NPI will be represented by more than one legacy identifier. Both cases could occur for the same provider. So there are limits to building a cross-reference automatically.

- **Permanent need for some legacy identifiers**. Some entities will continue to be identified by legacy identifiers and not NPI. For example, there are entities that submit claims but that are not eligible for NPI, and there are other reasons. For entities that do not obtain and use NPI, the Dual strategy is irrelevant.

- **Not a complete solution to cross-reference**. Automatic building of cross-reference indices by a receiving plan or other entity from Dual NPI-Legacy identification is not sufficient for a plan or other entity to deal with an organizational provider's subpart and affiliated NPI's; so a plan or other entity will need either to obtain the information directly from its providers or obtain the information from a provider organization, a clearinghouse, or other entity that develops the information.

7.5 Receiver modifies internal systems to use NPI

At its own pace, the receiver modifies its own internal systems to rely on NPI, when available, instead of the old Legacy identifier, to identify a provider. By this statement we do not mean that the receiver must use NPI internally, but that it makes its systems capable of identifying the providers on a transaction using only their NPI instead of depending on their Legacy Identifiers. The receiver must notify its trading partners when it is making the shift to using NPI instead of legacy identifiers.

If an NPI is not available on a transaction, the receiver's systems must be able to identify the provider with a Legacy Identifier. This is a permanent requirement inasmuch as there will continue to be providers, and non-provider claimants, who will not obtain NPIs or are not eligible to obtain NPIs.

7.6 Discontinue unnecessary Legacy Identifiers

When both trading partners are using the NPI to identify providers on standard transactions and are not using unnecessary legacy identifiers in these transactions, the trading partners may agree that the sender may discontinue sending these identifiers. The receiver will continue to support Dual NPI-Legacy identifiers in its systems until no other trading partners require the dual support. Note that Federal Tax ID continues to be mandatory in certain fields after the NPI compliance date.

7.7 Contingency after compliance date?

The Dual Use of NPI & Legacy Identifiers strategy is not permitted after the NPI compliance date. Yet there are two frequently asked questions:

- May legacy identifiers, other than required tax IDs, be used in addition to NPI after the compliance date? No.

- May legacy identifiers, other than required tax IDs, be used in addition to NPI so long as version 4010A1 is used since that version seems to allow it? No. Legacy identifiers, other than required tax IDs, are permitted only until the compliance date.

Nevertheless, in the unlikely event CMS were to determine that industry needed another contingency plan such as the one that followed the Transactions compliance date, it would be technically feasible to continue the Dual NPI-Legacy Identifier strategy temporarily after the compliance date.

8.0 Business Case

Implemented one pair of trading partners at a time, NPI could have the same potential for a huge bilateral testing and conversion workload as did conversion to standard transactions. Getting computers of any two parties to talk the same language can be time consuming, while the enormous number of trading partner pairs exponentially multiplies the workload.

The key solutions to this challenge are:

a. **Schedule independence**. Each entity's system change schedule becomes largely independent of its trading partners' schedules; and…

b. **Smaller steps**. The conversion is accomplished with a series of smaller steps.

The Dual NPI-Legacy strategy achieves both of these goals. As soon as the receiver is ready to receive both the new NPI and the old Legacy identifiers, even if the receiver only actually uses a legacy identifier, the sender can start sending NPI in its primary, permanent position according to the schedule convenient to the sender. The sender is largely able to start[4]

[4] The assumption is that the sender, before it starts sending NPI and legacy identifiers will have completed its capture, verification, and mapping of the NPIs and legacy identifiers of itself and it associated physicians and other providers.

sending NPI without much systems coordination with the receiver. Similarly, the receiver is able to start using the NPIs that it receives as the primary identifier when it is most convenient to the receiver's schedule.

The heavy work is still in making changes to an entity's internal systems, but there is much less work required to coordinate telecommunications and schedules with trading partners. Schedule independence is a very significant benefit to NPI implementation. Each party is able to plan and complete its required work largely according to its own schedule.

9.0 837 Institutional Health Care Claim

The following table specifies NPI and Legacy identifiers to be used on a standard 837 **Institutional** Health Care Claim during the transition. The first table only lists provider entries that will employ the NPI. All the additional or secondary identifier entries are within a repeated loop. The legacy identifier may be any iteration in the loop.

837 Institutional Health Care Claim, 4010A1 Implementation Guide

Loop	Data Element	Industry Name	Content
2010AA		**BILLING PROVIDER NAME**	
	NM109	Billing Provider Identifier	NPI
	REF02	Billing Provider Additional Identifier	Tax ID
	REF02	Billing Provider Additional Identifier	Legacy
2010AB		**PAY-TO PROVIDER NAME**	
	NM109	Pay-To Provider Identifier	NPI
	REF02	Pay-To Provider Additional Identifier	Tax ID
	REF02	Pay-To Provider Additional Identifier	Legacy
2310A		**ATTENDING PHYSICIAN NAME**	
	NM109	Attending Physician Primary Identifier	NPI
	REF02	Attending Physician Secondary Identifier	Legacy
2310B		**OPERATING PHYSICIAN NAME**	
	NM109	Operating Physician Primary Identifier	NPI
	REF02	Operating Physician Secondary Identifier	Legacy
2310C		**OTHER PROVIDER NAME**	
	NM109	Other Provider Primary Identifier	NPI
	REF02	Other Provider Secondary Identifier	Legacy
2310E		**SERVICE FACILITY NAME**	
	NM109	Service Facility Primary Identifier	NPI
	REF02	Service Facility Secondary Identifier	Legacy
2420A		**ATTENDING PHYSICIAN NAME**	
	NM109	Attending Physician Primary Identifier	NPI
	REF02	Attending Physician Secondary Identifier	Legacy
2420B		**OPERATING PHYSICIAN NAME**	
	NM109	Operating Physician Primary Identifier	NPI
	REF02	Operating Physician Secondary Identifier	Legacy
2420C		**OTHER PROVIDER NAME**	
	NM109	Other provider Primary Identifier	NPI

837 Institutional Health Care Claim, 4010A1 Implementation Guide			
Loop	**Data Element**	**Industry Name**	**Content**
	REF02	Other provider Secondary Identifier	Legacy

837 Institutional Health Care Claim, 4010A1 Implementation Guide NPI is not used in the following locations:			
Loop	**Data Element**	**Industry Name**	**Content**
2330D		**OTHER PAYER ATTENDING PROVIDER**	
	REF02	Other Payer Attending Provider Identifier	Legacy
2330E		**OTHER PAYER OPERATING PROVIDER**	
	REF02	Other Payer Operating Provider Identifier	Legacy
2330F		**OTHER PAYER OTHER PROVIDER**	
	REF02	Other Payer Other Provider Identifier	Legacy
2330H		**OTHER PAYER SERVICE FACILITY PROVIDER**	
	REF02	Other Payer Service Facility Provider Identifier	Legacy

10.0 837 Professional Health Care Claim

The following table specifies NPI and Legacy identifiers to be used on a standard 837 **Professional** Health Care Claim during the transition. The first table only lists provider entries that will employ the NPI. All the additional or secondary identifier entries are within a repeated loop. The legacy identifier may be any iteration in the loop.

837 Professional Health Care Claim, 4010A1 Implementation Guide			
Loop	**Data Element**	**Industry Name**	**Content**
2010AA		**BILLING PROVIDER NAME**	
	NM109	Billing Provider Identifier	NPI
	REF02	Billing Provider Additional Identifier	Tax ID
	REF02	Billing Provider Additional Identifier	Legacy
2010AB		**PAY-TO PROVIDER NAME**	
	NM109	Pay-To Provider Identifier	NPI
	REF02	Pay-To Provider Additional Identifier	Tax ID
	REF02	Pay-To Provider Additional Identifier	Legacy
2310A		**REFERRING PROVIDER NAME**	
	NM109	Referring provider Primary Identifier	NPI
	REF02	Referring provider Secondary Identifier	Legacy
2310B		**RENDERING PROVIDER NAME**	
	NM109	Rendering provider Primary Identifier	NPI
	REF02	Rendering provider Secondary Identifier	Legacy
2310C		**PURCHASED SERVICE PROVIDER NAME**	
	NM109	Purchased service Provider Primary Identifier	NPI
	REF02	Purchased service Provider Secondary Identifier	Legacy

837 Professional Health Care Claim, 4010A1 Implementation Guide			
Loop	**Data Element**	**Industry Name**	**Content**
2310D		**SERVICE FACILITY LOCATION**	
	NM109	Laboratory or Facility Primary Identifier	NPI
	REF02	Laboratory or Facility Secondary Identifier	Legacy
2310E		**SUPERVISING PROVIDER NAME**	
	NM109	Supervising Provider Primary Identifier	NPI
	REF02	Supervising Provider Secondary Identifier	Legacy
2420A		**RENDERING PROVIDER NAME**	
	NM109	Rendering provider Primary Identifier	NPI
	REF02	Rendering provider Secondary Identifier	Legacy
2420B		**PURCHASED SERVICE PROVIDER NAME**	
	NM109	Purchased service provider Primary Identifier	NPI
	REF02	Purchased service provider Secondary Identifier	Legacy
2420C		**SERVICE FACILITY LOCATION**	
	NM109	Laboratory or Facility Primary Identifier	NPI
	REF02	Laboratory or Facility Secondary Identifier	Legacy
2420D		**SUPERVISING PROVIDER NAME**	
	NM109	Supervising Provider Identifier	NPI
	REF02	Supervising Provider Secondary Identifier	Legacy
2420E		**ORDERING PROVIDER NAME**	
	NM109	Ordering Provider Identifier	NPI
	REF02	Ordering Provider Secondary Identifier	Legacy
2420F		**REFERRING PROVIDER NAME**	
	NM109	Referring Provider Identifier	NPI
	REF02	Referring Provider Secondary Identifier	Legacy

837 Professional Health Care Claim, 4010A1 Implementation Guide NPI is not used in the following locations:			
Loop	**Data Element**	**Industry Name**	**Content**
2330D		**OTHER PAYER REFERRING PROVIDER**	
	REF02	Other Payer Referring Provider Identifier	Legacy
2330E		**OTHER PAYER RENDERING PROVIDER**	
	REF02	Other Payer Rendering Provider Identifier	Legacy
2330F		**OTHER PAYER PURCHASED SERVICE PROVIDER**	
	REF02	Other Payer Purchased Service Provider Identifier	Legacy
2330G		**OTHER PAYER SERVICE FACILITY LOCATION**	
	REF02	Other Payer Service Facility Location Identifier	Legacy
2330H		**OTHER PAYER SUPERVISING PROVIDER**	
		Other Payer Supervising Provider Identifier	Legacy

11.0 837 Dental Health Care Claim

The following table specifies NPI and Legacy identifiers to be used on a standard 837 **Dental** Health Care Claim during the transition. The first table only lists provider entries that will employ the NPI. All the additional or secondary identifier entries are within a repeated loop. The legacy identifier may be any iteration in the loop.

837 Dental Health Care Claim, 4010A Implementation Guide

Loop	Data Element	Industry Name	Content
2010AA		**BILLING PROVIDER NAME**	
	NM109	Billing Provider Identifier	NPI
	REF02	Billing Provider Additional Identifier	Tax ID
	REF02	Billing Provider Additional Identifier	Legacy
2010AB		**PAY-TO PROVIDER NAME**	
	NM109	Pay-To Provider Identifier	NPI
	REF02	Pay-To Provider Additional Identifier	Tax ID
	REF02	Pay-To Provider Additional Identifier	Legacy
2310A		**REFERRING PROVIDER PHYSICIAN NAME**	
	NM109	Referring provider Physician Primary Identifier	NPI
	REF02	Referring provider Physician Secondary Identifier	Legacy
2310B		**RENDERING PROVIDER NAME**	
	NM109	Rendering provider Primary Identifier	NPI
	REF02	Rendering provider Secondary Identifier	Legacy
2310C		**SERVICE FACILITY LOCATION**	
	NM109	Laboratory or Facility Primary Identifier	NPI
	REF02	Laboratory or Facility Secondary Identifier	Legacy
2310D		**ASSISTANT SURGEON NAME**	
	NM109	Assistant Surgeon Identifier	NPI
	REF02	Assistant Surgeon Secondary Identifier	Legacy
2420A		**RENDERING PROVIDER NAME**	
	NM109	Rendering provider Primary Identifier	NPI
	REF02	Rendering provider Secondary Identifier	Legacy
2420C		**ASSISTANT SURGEON NAME**	
	NM109	Assistant Surgeon Identifier	NPI
	REF02	Assistant Surgeon Secondary Identifier	Legacy

837 Dental Health Care Claim, 4010A1 Implementation Guide
NPI is not used in the following locations:

Loop	Data Element	Industry Name	Content
2330D		**OTHER PAYER REFERRING PROVIDER**	
	REF02	Other Payer Referring Provider Identifier	Legacy
2330E		**OTHER PAYER RENDERING PROVIDER**	
	REF02	Other Payer Rendering Provider Identifier	Legacy

12.0 835 Remittance Advice

The following table specifies identifiers to be used on a standard 835 **Remittance Advice** during the transition. The table only lists provider entries that will employ the NPI. The 835 does not perfectly lend itself to the Dual NPI-Legacy strategy; see notes to the table. In most cases the deficiencies, which deal with rendering providers, may not be important.

835 Health Care Claim Payment, 4010A1 Implementation Guide

Loop	Data Element	Industry Name	Content
1000B		**PAYEE IDENTIFICATION**	
	N104	Payee Identification Code	NPI if available
	REF02	Additional Payee Identifier	Tax ID
	REF02	Additional Payee Identifier	Legacy
2000		**PROVIDER SUMMARY INFORMATION**	
	TS301	Provider Identifier	NPI
2100		**CLAIM PAYMENT INFORMATION**	
		Rendering Provider Name	
	NM109	Rendering provider Primary Identifier	NPI
	REF02	Rendering provider Secondary Identifier	Legacy
2110		**SERVICE PAYMENT INFORMATION**	
	REF02	Rendering Provider Identifier	NPI
	REF02	Rendering Provider Identifier	Legacy

Notes:

1) Loop 2000, used to identify subsidiary providers, does not provide for secondary identification. TS301 identifies a subsidiary provider. Use the appropriate Subpart NPI for the subsidiary.

2) In loop 2100 the REF segment does not have qualifier codes for Federal Tax ID or State License number. If either of these were being used as primary in NM109 prior to NPI, then when NPI is used as primary, there is no place for them in this loop; however, it is usually possible to identify the rendering provider in the service line loop.

13.0 270 Eligibility Benefit Inquiry

The following table specifies NPI and Legacy identifiers to be used on a standard 270/271 Eligibility Benefit Inquiry during the transition. The table only lists provider entries that will employ the NPI. The additional identifier entries are within a repeated loop. The legacy identifier may be any iteration in the loop.

The 270/271 Eligibility Benefit Inquiry and Response transactions only allow for a single identifier per information source. Typically the information source is an insurer or payer, in which case the transactions can support a dual use strategy for NPI. However, dual use is not supported when a specific provider needs to be identified at the subscriber or dependent level.

270 Eligibility Benefit Inquiry, 4010A1 Implementation Guide

Loop	Data Element	Industry Name	Content
2100B		**INFORMATION RECEIVER**	
	NM109	Information Receiver Name	NPI
	REF02	Information Receiver Additional Identification	Legacy

Notes:

1) Loop 2100A "Information Source Name" allows for NPI to be used to identify the information source.. However Loop 2100A is not included in the table because the absence of a supplemental identifier segment for this loop means that a dual use strategy not available when using NPI to identify the source.

2) There are no loops containing provider identification that do not support the NPI.

3) REF02 in Loop 2100B can also be used to send NPI "prior to being mandated for use". However, once mandated for use, the NPI has to be sent in NM109. Allowing for the NPI in REF02 therefore does not assist those transitioning to the requirements that apply once NPI is mandated.

4) Provider Identification is allowed for in Loops 2100C and 2100D. When these segments are not used by the recipient, or are used to identify a taxonomy code, dual use is supported. Dual use is not supported when Loops 2100C and 2100D are needed to to identify a specific provider, so these loops are not shown in the table.

14.0 271 Eligibility Benefit Inquiry Response

The following table specifies NPI and Legacy identifiers to be used on a standard 271 Eligibility Benefit Response during the transition. The table only lists provider entries that will employ the NPI. The Information Receiver Additional Identification is within a repeated loop so that the legacy identifier may be any iteration in that loop.

271 Eligibility Benefit Response, 4010A1 Implementation Guide			
Loop	**Data Element**	**Industry Name**	**Content**
2100B		**INFORMATION RECEIVER**	
	NM109	Information Receiver Name	NPI
	REF02	Information Receiver Additional Identification	Legacy
2120C		**SUBSCRIBER BENEFIT RELATED ENTITY NAME**	
	NM109	Benefit Related Entity Identifier	NPI
	PRV03	Provider Identifier	Legacy
2120D		**DEPENDENT BENEFIT RELATED ENTITY NAME**	
	NM109	Benefit Related Entity Identifier	NPI
	PRV03	Provider Identifier	Legacy

Notes:

1) Loop 2100A “Information Source Name” allows for NPI to be used to identify the information source.. However Loop 2100A is not included in the table because the absence of a supplemental identifier segment for this loop means that a dual use strategy is not available when using NPI to identify the source.

2) All loops that contain provider identification support the NPI..

3) REF02 in Loop 2100B can also be used to send NPI “prior to being mandated for use”. However, once mandated for use, the NPI has to be sent in NM109. Allowing for the NPI in REF02 therefore does not assist those transitioning to the requirements that apply once NPI is mandated.

4) Loops 2120C and 2120D are sent only in some situations, and in those situations, provider identification numbers are not always used. 271 recipients implementing a dual use strategy should determine if they make use of the provider identifiers that may currently be sent in 2120C and 2120D NM109. If so, a dual use strategy should include making sure provision has been made for the use of legacy IDs in PRV03. However, if the use of loops 2120C and 2120D requires a taxonomy code, only one provider ID may be sent (in the NM109) as the single instance of PRV03 is also used for taxonomy code. In addition, the qualifier lists used in NM108 and PRV02 to describe the legacy codes sent in NM109 and PRV03 use different wording and codes, requiring a crosswalk be created between those codes.

5) PRV03 in loops 2120C and 2120D can also be used to send NPI “prior to being mandated for use”. However, once mandated for use, the NPI has to be sent in NM109. Allowing for the NPI in PRV03 is therefore redundant, and does not assist those transitioning to the requirements that apply once NPI is mandated.

15.0 278 Health Care Services Review – Request for Review

The following table specifies NPI and Legacy identifiers to be allowed for on a standard 278 Health Care Services Review Request during the transition. The table only lists provider entries that will employ the NPI. All the supplemental identifier entries are within a repeated loop. The legacy identifier may be any iteration in the loop.

The 278 Health Care Services Review, Request for Review and Response transactions only allows for a single identifier per Utilization Management Organization (UMO). A dual use strategy is supported except for situations in which a UMO is identified by an NPI.

278 Health Care Services Review – Request for Review
4010X094A1 Implementation Guide

Loop	Data Element	Industry Name	Content
2010B		**REQUESTER NAME**	
	NM109	Requesting Provider Identifier	NPI
	REF02	Requester Supplemental Identifier	Legacy
2010E		**SERVICE PROVIDER NAME(S)**	
	NM109	Service Provider Identifier	NPI
	REF02	Service Provider Supplemental Identifier	Legacy

Notes:

1) Loop 2010A "Utilization Management Organization (UMO) Name" allows for NPI to be used to identify the UMO. However, as there is no supplemental identifier segment for this loop, a dual use strategy is not available when the NPI is used to identify a UMO. When the UMO is a payer, provider IDs are not used in Loop 2010A; so Loop 2010A is not included in the table.

2) There are no loops containing provider identification that do not support the NPI.

16.0 278 Health Care Services Review – Response

The following table specifies NPI and Legacy identifiers to be allowed for on a standard 278 Health Care Services Review Response during the transition. The table only lists provider entries that will employ the NPI. All the additional or secondary identifier entries are within a repeated loop. The legacy identifier may be any iteration in the loop.

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Loop	Data Element	Industry Name	Content
2010B		**REQUESTER NAME**	
	NM109	Requesting Provider Identifier	NPI
	REF02	Requester Supplemental Identifier	Legacy
2010E(s)		**SERVICE PROVIDER NAME(S)**	
	NM109	Service Provider Identifier	NPI
	REF02	Service Provider Supplemental Identifier	Legacy

Notes:

1) Loop 2010A "Utilization Management Organization (UMO) Name" allows for NPI to be used to identify the UMO. However, as there is no supplemental identifier segment for this loop, a dual use strategy not available when the NPI is used to identify a UMO. When the UMO is a payer, provider IDs are not used in Loop 2010A; so Loop 2010A is not included in the table.

2) There are no loops containing provider identification that do not support the NPI.

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